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Counsel for Defendant SANH CHAN THAI

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	\ 1:05-cr-102 OWW
Plaintiff,	— STIPULATION AND ORDER MODIFYING  THE CONDITIONS OF BOND
VS.	
SANH CHAN THAI,	
Defendant.	/

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff, United States of America, by and through its attorney of record, Assistant United States Attorney, Jonathan B. Conklin, and defendant Sanh Chan Thai, by and through his attorney of record, Stephen Mensel, that the conditions of bond previously set be modified to allow Mr. Thai to travel to Philadelphia, PA, for a period of up to seven days to visit his cousin who is in critical condition in the hospital:

All other conditions previously set remain in effect.

Mr. Thai is on courtesy supervision from a \$100,000 bond in a related case in the Central District of California: U.S. v. Sanh Thai; 2:04-cr-01261. District Judge Dale S. Fisher in that matter ordered on September 22, 2005, the requested amendment to Mr. Thai's conditions of release. Reference is requested to that docket and order and the declaration of Central District Counsel and exhibits submitted in support of the requested modification of conditions. The affidavit and exhibits are hereby adopted by this Eastern District counsel for Mr. Thai and attached as exhibits.

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Respectfully submitted, 1 Dated: September 28, 2005 /s/Stephen Mensel 2 STEPHEN MENSEL, Attorney for Defendant 3 McGREGOR W. SCOTT **United States Attorney** 4 5 Dated: September 28, 2005 /s/Jonathan B.Conklin JONATHAN B. CONKLIN Assistant U.S. Attorney 6 7 ORDER 8 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED THAT, the bond 9 conditions previously set in this matter be modified to allow defendant, Sanh ChanThai, 10 to travel to Philadelphia, PA, for a period of up to seven days. Once this seven day 11 period is determined, Mr. Thai is ordered to provide pre-trial services in Los Angeles 12 and Fresno 24 hours notice of his departure and provide contact information to pre-trial 13 while he is in Philadelphia. 14 DATED: September \_\_\_, 2005 /s/ OLIVER W. WANGER 15 OLIVER W. WANGER United States District Judge 16 17 18 19 20 21 22 23 24 25 26 27 28 29